

ORDER



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

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December 21, 2021

BY ECF

Honorable James B. Clark
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: ***Maritza Melendez v. Alejandro Mayorkas,***
Civil Action No. 2:19-cv-4830 (JMV)(JBC)

Your Honor:

I represent the Government in the above-captioned employment discrimination matter. I write jointly with counsel for plaintiff to seek an extension of fact discovery from December 31, 2021 to March 31, 2022. As the Court is aware, the parties sought Court intervention in September 2021 to resolve a discovery dispute. Following the Court's September 28, 2021 Order, in which the Court extended fact discovery to December 31, 2021, the parties produced certain outstanding paper discovery in October and November 2021. However, due to the holidays in November and December, and other mutual scheduling issues, the parties have been unable to schedule and complete fact depositions and will not be able to do so by the December 31, 2021 deadline. The parties expect to complete between 10-15 depositions in this case. Accordingly, the parties jointly request that the Court extend fact discovery by a period of ninety days, from December 31, 2021 to March 31, 2022, to allow the parties to complete depositions and any other fact discovery. If the Court is amenable to the parties' extension request, we respectfully request that the Court adjourn the January 4, 2022 conference to a date in March or April 2022. If the parties require the Court's assistance prior to that time for any discovery issues, we will promptly advise the Court after attempting to informally resolve those issues.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ Ben Kuruvilla
BEN KURUVILLA
Assistant United States Attorney

cc: **By ECF**

Timothy Charles Parlatore, Esq.
Maryam Hadden, Esq.
Counsel for Plaintiff

*Fact discovery shall be completed by
March 31, 2022.

*The January 4, 2022 telephone conference is
adjourned to March 31, 2022 at
11:30 AM.

SO ORDERED

s/James B. Clark

James B. Clark, U.S.M.J.

Date: 12/22/2021